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June 18, 2003

Oscar Hernandez, Director, 7403M
US EPA OPPTS
Risk Assessment Division
1201 Constitution Avenue NW
Washington, DC 20460

VIA FEDERAL EXPRESS

Subject: Resubmittal of Information for the HPV Challenge Program in response to
October 15, 2002 letter.

Dear Mr. Hernandez,

On October 1, 2001, 3M submitted its Test Plan and Robust Summaries for the class of inert perfluorinated compounds (PFCs) covered by a single "generic" CAS No. 86508-42-1 as "Perfluoro-compounds, C5-C18" to the HPV Challenge Program, AR-201. The EPA responded on October 15, 2002 that for the purpose of meeting the HPV Challenge Program, you need information to adequately cover 3 subcategories of chemicals: perfluorinated hydrocarbons, perfluorinated ethers, and perfluorinated tertiary amines.

Please find enclosed a rework of the one initial 3M submission to two subcategory submissions as follows: CAS No. 86508-42-1 Perfluoro-compounds, C5-C18 alkanes and CAS No. 86508-42-1 Perfluoro-compounds, C5-C18 amines. Total volumes of products within each of the two described subcategories meet the HPV criteria. A third possible subcategory of CAS No. 86508-42-1 Perfluoro-compounds, C5-C18 ethers is not being submitted because total volumes of products within that subcategory do not meet the HPV criteria. As additional background for representing the data in the two subcategories, please be informed that total volume of CAS No. 311-89-7 alone would be "no longer HPV" and is therefore included in the PFC amine subcategory.

These Robust Summaries and Test Plan supercede those submitted on October 1, 2001. The primary difference between this submission and the October 1, 2001 submission is with regards to formatting. In other words, robust summaries for both PFC alkanes and PFC amines were provided together under the test description in the earlier submission and are separated into the two subcategories in this submission. The following robust summaries have been added to this submission: octanol/water partition coefficients of

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PFC alkanes on page 8; biodegradation of PFC alkanes on page 14; aquatic invertebrate toxicity of PFC amines on page 54 and aquatic plant toxicity of PFC amines on page 55. The following robust summaries were removed: acute mammalian toxicity and aquatic invertebrate toxicity of PFC ethers and reference to products B and E under identity Section 1.2, which represented PFC ethers.

Because available data are sufficient to address relevant endpoints, no further testing is proposed. This information is provided in .pdf format on a CD and hardcopy.

If you have any questions relative to this submittal, please contact me at 651-736-2032.

Sincerely,

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